

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
JOY CHEN  
3 Assistant Federal Public Defender  
411 E. Bonneville, Ste. 250  
4 Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
5 Joy\_Chen@fd.org

6 Attorney for Robin Perry

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 ROBIN PERRY,

14 Defendant.

Case No. 2:22-cr-00288-APG-DJA

**STIPULATION TO CONTINUE  
REVOCATION HEARING**  
(First Request)

15  
16 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
17 United States Attorney, and Daniel Schiess, Assistant United States Attorney, counsel for the  
18 United States of America, and Rene L. Valladares, Federal Public Defender, and Joy Chen,  
19 Assistant Federal Public Defender, counsel for Robin Perry, that the Revocation Hearing  
20 currently scheduled on May 18, 2023 at 12:30 p.m., be vacated and continued to a date and time  
21 convenient to the Court but no sooner than thirty (30) days.

22 This Stipulation is entered into for the following reasons:

- 23 1. Defense counsel will be out of district on the currently scheduled hearing date.  
24 2. Defense counsel requires more time to conduct investigation and review  
25 discovery to determine whether this matter will resolve through a negotiated resolution or will  
26 proceed to a contested hearing.

1           3.       The defendant is not in custody and agrees with the need for the continuance.

2           4.       The parties agree to the continuance.

3           This is the first request for a continuance of the revocation hearing.

4           DATED this 11th day of May 2023.

5  
6           RENE L. VALLADARES  
7           Federal Public Defender

            JASON M. FRIERSON  
            United States Attorney

8           */s/ Joy Chen*  
9           By \_\_\_\_\_  
10          JOY CHEN  
            Assistant Federal Public Defender

*/s/ Daniel Schiess*  
            By \_\_\_\_\_  
            DANIEL SCHIESS  
            Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 ROBIN PERRY,


7 Defendant.  
8

Case No. 2:22-cr-00288-APG-DJA

**ORDER**

9  
10 Based on the pending Stipulation of counsel, and good cause appearing,  
11 IT IS ORDERED that the revocation hearing currently scheduled for Thursday, May  
12 18, 2023 at 9:00 a.m., be vacated and continued to June 29, 2023 at the hour of 9:00 a.m. in  
13 Courtroom 6C.

14 DATED this 15th day of May 2023.

15  
16   
17 UNITED STATES DISTRICT JUDGE